

BRADLEY S. MAINOR, ESQ. (#7434)
brad@me-injury.com
ADAM ELLIS, ESQ. (#14514)
adam@me-injury.com
TAYLOR K. CALMELAT, ESQ. (#16681)
taylor@me-injury.com
MAINOR ELLIS INJURY LAWYERS
8367 W. Flamingo Rd., Suite 200
Las Vegas, Nevada 89147
Tel. 702-450-5000 | Fax 702-733-1106
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RONALD OTIS BOYD II, an individual;

Plaintiff,

vs.

MB PROSOUND AND STAGING, INC., a
Foreign Corporation; DOE DEFENDANTS I
– XX, inclusive; DOE MB PROSOUND
EMPLOYEES I – XX; and ROE
CORPORATIONS I – XX, inclusive,

Defendants.

CASE NO.: 2:23-cv-02092-APG-VCF

JOINT PRETRIAL ORDER

After pretrial proceedings in this case, IT IS SO ORDERED:

I.

A. Summary of Action

This is a negligence case arising from personal injury Plaintiff Ronald Otis Boyd suffered on September 13, 2021 when an electric cart operated by an agent of MB Prosound and Staging, Inc. collided with Mr. Boyd inside Allegiant Stadium.

B. Relief Sought

Plaintiff is seeking general and special monetary damages.

C. Contentions of the Parties

a. Plaintiff's Contentions:

1 Plaintiff contends that he suffered serious injuries as a result of the subject incident, which
2 required medical treatment, and for which future medical treatment may be required. Defendants
3 contest the nature and extent of Plaintiff's injuries.

4 **II.**

5 **Statement of Jurisdiction**

6 This Court has diversity jurisdiction over this matter pursuant to 28 U.S.C. § 1332(A)(1),
7 as the alleged value of the matter in controversy exceeds \$75,000.00, and the suit is between citizens
8 of different states.

9 **III.**

10 **The following facts are admitted by the parties and require no proof:**

- 11 1. Plaintiff was injured on September 13, 2021 when an electric cart operated by an agent of
12 MB Prosound and Staging, Inc. collided with him at Allegiant Stadium ("the Incident").
13 2. Defendant's employee, Robert English owed Plaintiff a duty of care.
14 3. Defendant's employee, Robert English's actions or inactions breached this duty of care.
15 4. Defendant is vicariously liable for any damages caused by the negligence of Robert English
16 with respect to the Incident and that no action or inactions of Plaintiff contributed to the Incident.

17 **IV.**

18 **The following facts, though not admitted, will not be contested at trial by evidence to the**
19 **contrary:**

20 None.

21 **V.**

22 **The following issues of fact are to be tried and determined at trial:**

23 The nature and extent of Plaintiff's injuries, as well as the amount of Plaintiff's past and
24 future general and special damages.

25 **VI.**

26 **The following issues of law are to be tried and determined at trial:**
27
28

The extent to which Plaintiff's alleged injuries were casually related to the subject incident.

VII.

(a) The following exhibits are stipulated as authentic and admitted into evidence in this case and may be so marked by the clerk:

#	DOCUMENT	BATES
1	Liability Loss Notice	DEF002-03
2	Community Ambulance Records	PLTF_7_0002-4
3	UMC Records	UMC0013-99
4	Desert Radiology Records	DR0001
5	Las Vegas Neurosurgery, Orthopedics & Rehab Records	LVNOR0004-61
6	Ardeshir Rohani Records	ROHANI0001-7, 9-24
7	Desert Orthopaedic Center Records	DOC0008-38
8	Pueblo Medical Imaging Records	PMI0006-7, 9; PLTF 11 0002-3
9	NV Orthopedic & Spine Center Records	NOSC0010-52
10	Specialty Surgery Center Records	SSC0005-26

(b) As to the following exhibits, the party against whom the same will be offered objects to their admission on the grounds stated:

(1) Plaintiff's exhibits/objections:

#	DOCUMENT	BATES	D'S OBJECTION
1	Leg Injury Photo - Turf in Background	PLTF_9_0001	FRE 403
2	Leg Injury Photo - On Gurney	PLTF_9_0002	FRE 403
3	Knee Laceration	PLTF_9_0003	FRE 403
4	Leg Injury Sutured 1	PLTF_9_0004	FRE 403
5	Leg Injury Sutured 2	PLTF_9_0005	FRE 403
6	Leg Injury Sutured - Weeping	PLTF_9_0006	FRE 403
7	Leg Injury Sutured 3	PLTF_9_0007	FRE 403
8	Leg Injury Scar	PLTF_9_0008	FRE 403
9	Sound Physician Bills	PLTF_2_0001-2	Foundation (901)
10	Institute of Orthopedic Surgery Records	PLTF_12_0001-35	Foundation (901)
11	Advanced Orthopedic Sports Medicine Records	PLTF_14_0002-3	Foundation (901)
12	Advanced Orthopedic Sports Medicine Bills	PLTF_14_0001	Foundation (901)

13	ATI Physical Therapy Records	PLTF_15_0009, 12-44	Foundation (901)
14	ATI Physical Therapy Bills	PLTF_15_0011	Foundation (901)
15	Community Ambulance Bills	PLTF_7_0001	Foundation (901)
16	UMC Bills	PLTF_1_0001-2	Foundation (901)
17	Desert Radiology Bills	PLTF_3_0001-3	Foundation (901)
18	Don Nobis PT Bills	PLTF_5_0001-65	Foundation (901)
19	Las Vegas Neurosurgery, Orthopedics & Rehab Bills	LVNOR0062	Foundation (901)
20	Ardeshir Rohani Bills	PLTF_6_0010-11	Foundation (901)
21	Desert Orthopaedic Center Bills	DOC0006, 39	Foundation (901)
22	Pueblo Medical Imaging Bills	PMI0001, 16	Foundation (901)
23	NV Orthopedic & Spine Center Bills	NOSC0005-9	Foundation (901)
24	Specialty Surgery Center Bills	SSC0003-4	Foundation (901)

(2) Defendant's exhibits:

#	<u>DOCUMENT</u>	<u>BATES</u>	<u>P'S OBJECTION</u>
1	MB Pro Sound & Staging Invoice to ESPN	DEF0001	Relevance (401)
2	Driver's License of Robert English	DEF0080	Relevance (401)
3	ESPN Emergency Evacuation Plan and Operations Management Plan	DEF0081- DEF0098	Relevance (401)
4	Dr. Wang Expert Report, CV, Rate Sheet, and Testimony List	N/A	Hearsay (802)
5	Dr. Gamradt Expert Report, CV, Rate Sheet, and Testimony List	N/A	Hearsay (802)
6	Any and all response to written discovery served by Plaintiff	N/A	Hearsay (802), Foundation (901)

(c) Electronic evidence:

The parties may offer Power Point images/drawings/diagrams/animations/story boards depicting the facts and circumstance of the accident, information relevant to communications between the parties, and/or deposition testimony.

(d) Depositions:

(1) Plaintiff will offer the following depositions:

Jim Cutshall: 14:19-19:8; 19:21-20:8; 21:14-21:1; 21:10-18; 21:24-22:20.

Robert Martinez, Jr.: 14:22-15:8; 15:25-17:15; 18:8-23.

(2) Defendant will offer the following depositions:

None

(e) Objections to depositions:

Defendant objects to plaintiff's depositions as follows: Defendant preserves any and all objections as stated on the record at the depositions to be offered. Further, there is no showing of unavailability or effort to bring the witness into court.

Plaintiff objects to defendant's depositions as follows:

VIII.

The following witnesses may be called by the parties at trial:

(a) Plaintiff intends to call the following witnesses at trial:

Plaintiff RONALD BOYD
c/o Bradley S. Mainor, Esq.
Adam Ellis, Esq.
MAINOR ELLIS, LLP
8367 W. Flamingo Road, Suite 200
Las Vegas, NV 89147
(702) 450-5000

Witness TOM MILLER
PO Box 82,
Washington, MO 63090
(619) 463-9180

Sep Bady, MD
ADVANCED ORTHOPEDICS & SPORTS MEDICINE
7195 Advanced Way
Las Vegas, NV 89113
(702) 740-5327

Don Nobis
DON NOBIS PROGRESSIVE PHYSICAL THERAPY
801 S. Rancho Drive, #F4
Las Vegas, NV 89106-3854
(702) 735-4844

Mark Kabins, MD
Treating Provider(s)
LAS VEGAS NEUROSURGERY, ORTHOPAEDICS & REHABILITATION

1 501 S. Rancho Drive, I-67
2 Las Vegas, NV 89106-4862
(702) 243-4700

3 Ardeshir Rohani, MD
4 ARDESHIR ROHANI, M.D.
3824 S. Jones Blvd., Suite A
5 Las Vegas, Nevada 89103
(702) 463-3000

6 Craig Tingey, MD
7 DESERT ORTHOPAEDIC CENTER
8689 W. Charleston Road, Suite 105
8 Las Vegas, NV 89117
(702) 731-1616

9 Edward S. Ashman, MD
10 NEVADA ORTHOPEDIC & SPINE CENTER
11 7455 W. Washington, Suite 160
12 Las Vegas, NV 89128-4356
(702) 966-1599

13 Plaintiff reserves the right to call any witnesses identified in Defendant's witness list;

14 **(b) Defendant intends to call the following witnesses at trial:**

15 Plaintiff RONALD BOYD
16 c/o Bradley S. Mainor, Esq.
Adam Ellis, Esq.
17 MAINOR ELLIS, LLP
8367 W. Flamingo Road, Suite 200
18 Las Vegas, NV 89147
(702) 450-5000

19 Witness TOM MILLER
20 PO Box 82,
Washington, MO 63090
21 (619) 463-9180

22 Sep Bady, MD
23 ADVANCED ORTHOPEDICS & SPORTS MEDICINE
7195 Advanced Way
24 Las Vegas, NV 89113
(702) 740-5327

25 Don Nobis
26 DON NOBIS PROGRESSIVE PHYSICAL THERAPY
801 S. Rancho Drive, #F4
27
28

MAINOR ELLIS, LLP
8367 W. Flamingo Road, Suite 200, Las Vegas, Nevada 89147
Phone: (702) 450-5000 | Fax: (702) 733-1106

1 Las Vegas, NV 89106-3854
(702) 735-4844

2
3 Mark Kabins, MD
4 LAS VEGAS NEUROSURGERY, ORTHOPAEDICS & REHABILITATION
5 501 S. Rancho Drive, I-67
Las Vegas, NV 89106-4862
(702) 243-4700

6 Ardeshir Rohani, MD
7 ARDESHIR ROHANI, M.D.
8 3824 S. Jones Blvd., Suite A
Las Vegas, Nevada 89103
(702) 463-3000

9 Craig Tingey, MD
10 DESERT ORTHOPAEDIC CENTER
11 8689 W. Charleston Road, Suite 105
Las Vegas, NV 89117
(702) 731-1616

12 Edward S. Ashman, MD
13 NEVADA ORTHOPEDIC & SPINE CENTER
14 7455 W. Washington, Suite 160
Las Vegas, NV 89128-4356
(702) 966-1599

15
16 Corporate Designee, MB PROSOUND AND STAGING, INC
17 c/o Mark C. Severino, Esq. and Tania Bonilla, Esq.
Wilson, Elser, Moskowitz, Edelman & Dicker LLP
18 6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119

19 Jim Cutshall
20 Address Unknown
Phone Number: (314) 308-7525

21 Robert English,
22 c/o Mark C. Severino, Esq. and Tania Bonilla, Esq.
23 Wilson, Elser, Moskowitz, Edelman & Dicker LLP
24 6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
Phone Number (727) 807-1130

25 Richard J. Martinez Sr.
26 MB PROSOUND & STAGING
27 c/o Mark C. Severino, Esq. and Tania Bonilla, Esq.
28

MAINOR ELLIS, LLP

8367 W. Flamingo Road, Suite 200, Las Vegas, Nevada 89147
Phone: (702) 450-5000 | Fax: (702) 733-1106

Wilson, Elser, Moskowitz, Edelman & Dicker LLP
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
Phone Number (727) 807-1130

FRCP 30(b)(6) and/or Custodian of Records of COMMUNITY AMBULANCE
91 Corporate Park Drive, Suite 120,
Henderson, NV 89012

FRCP 30(b)(6) and/or Custodian of Records of UNIVERSITY MEDICAL CENTER
1800 W. Charleston Blvd.
Las Vegas, NV 89102

FRCP 30(b)(6) and/or Custodian of Records of SOUND PHYSICIANS EMERGENCY
MEDICINE
PO Box 748996
Los Angeles, CA 90074

FRCP 30(b)(6) and/or Custodian of Records of DESERT RADIOLOGY SOLUTIONS
PO Box 841645
Los Angeles, CA 90084

FRCP 30(b)(6) and/or Custodian of Records of PUEBLO MEDICAL IMAGING
100 n. Green Valley Parkway, Ste. 150
Henderson, NV 89074

Jeffrey C. Wang, M.D.
Chief, Orthopaedic Spine Service
Co-Director USC Spine Center
Professor of Orthopaedic Surgery and Neurosurgery
USC Spine Center
1450 San Pablo St., Suite 5400
Los Angeles, CA 90033
Phone: (323) 442-5303

Seth Gamradt, MD
Associate Professor of Clinical Orthopaedic Surgery
Director of Orthopaedic Athletic Medicine
University of Southern California
Keck Medicine of USC
1520 San Pablo Street, Suite 2000
Los Angeles, CA 90033
Phone: (323) 442-5739

///

IX.

The parties jointly offer the following trial dates:

November 3-7, 2025; November 10-14, 2025.

X.

It is expressly understood by the undersigned that the court will set the trial of this matter on one of the agreed-upon dates if possible; if not, the trial will be set at the convenience of the court's calendar.

The parties estimate that trial will take a total of 4 days, including jury selection.

APPROVED AS TO FORM AND CONTENT:

DATED July 23, 2025

DATED July 23, 2025

MAINOR ELLIS, LLP

WILSON, ELSE, MOSKOWITZ
EDELMAN & DICKER, LLP

/s/ Adam Ellis

/s/ Mark Severino

BRADLEY S. MAINOR, ESQ. (#7434)

MARK SEVERINO, ESQ. (#14117)

ADAM ELLIS, ESQ. (#14514)

TANIA BONILLA, ESQ. (#15703)

8367 W. Flamingo Road, Suite 200

6689 Las Vegas Boulevard South, Suite 200

Las Vegas, NV 89147

Las Vegas, NV 89119

Attorneys for Plaintiff

Attorneys for Defendant

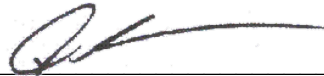
XI.

ACTION BY THE COURT

This case is set for jury trial on the November 17, 2025 at 9:00 a.m. trial stack. Calendar call will be held on November 12, 2025 at 9:00 a.m. All in courtroom 6C.

This pretrial order has been approved by the parties to this action as evidenced by their signatures or the signatures of their attorneys hereon, and the order is hereby entered and will govern the trial of this case. This order may not be amended except by court order and based upon the parties' agreement or to prevent manifest injustice.

DATED: July 24, 2025



ANDREW P. GORDON

CHIEF UNITED STATES DISTRICT JUDGE